AUG 5 - 2005

II. Summary of Safety and Effectiveness

Splash!® Dental Impression Material

1. Date of Summary:

2. Date of Summary

Preparation:

July 15, 2005

3. Submitting Firm:

Discus Dental, Inc.

4. Contact Person

Suzanne Ridgway

Regulatory Affairs Coordinator

Discus Dental, Inc. 8550 Higuera Street Culver City, CA 90232 310.845-8345 - phone 310.845.8647 - fax

5. Name of Medical Device

Proprietary Name:

Splash!® Dental Impression Material

Common/Usual Name:

Dental Impression Material

Classification Name:

Impression Material

6. Description of Medical Device

Splash!® Dental Impression Material is an addition-reaction base/catalyst polyvinylsiloxane dental impression material. It is available in Regular set or fast-setting Half-time varieties. Both are available in a heavy viscosity and in wild berry flavor, as well as unflavored.

7. Intended Use

Splash!® Dental Impression Material is intended for use with all crowns, bridges, occlusal and dental implant impression techniques to reproduce the structure of a patient's teeth and gums.

8. Substantial Equivalence Determination

Evaluations and in-house testing of the new Splash!® Dental Impression Material device by Discus Dental, Inc. have shown this device to be substantially equivalent to the following commercially marketed impression materials:

Predicate Device Company 510(k) No.

(Primary)

Precision VPS Impression Discus Dental K040053

Material

<u>Predicate Device</u> <u>Company</u> <u>510(k) No.</u>

(Secondary)

P2 Polyether Heraeus Kulzer Inc K030318

Aquasil Smart Wetting

Denstply, Intl.

K021416

Impression Material

Predicate Similarities

Product	Company	ISO 4823	Recovery from Deformation	Shrinkage	Storage Conditions
Splash!	Discus Dental	Type 0-3	99.2- 99.5%	Max. <0.10%	59° -78° F (15° -25° C)
Aquasil	Dentsply	Type 1-3	>98.0%	<0.50%	65° -80° F (18° -25° C)
P2 Polyether	Heraeus Kulzer	Type 1-3	97.5 – 98.0%	0.40 - 0.50%	65° -80° F (18° -25° C)
Precision	Discus Dental	Type 0 -3	99.3- 99.6%	Max. 0.10%	59° -78° F (15° -25° C)

Predicate Differences

Product	Company	Working time	Hardness (Shore A)	Strain in Compression	Shrinkage	Storage Conditions
Splash!	Discus Dental	55 sec – 65 sec	62- 67	2.3 - 2.5%	Max. <0.10%	59° -78° F (15° -25° C)
Aquasil	Dentsply	75 sec – 105 sec	Data Not Available	1 – 5%	<0.50%	65° -80° F (18° -25° C)
P2 Polyether	Heraeus Kulzer	120 sec.	44 - 64	4.3 – 10%	0.40 – 0.50%	65° -80° F (18° -25° C)
Precision	Discus Dental	45 – 105 sec	44 – 69	2.1 – 4.5%	0.10%	59° -78° F (15° -25° C)

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AUG 5 - 2005

Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

Discus Dental, Incorporated C/O Dr. Alfredo J. Quattrone Responsible Third Party Official California Department of Health Services Food & Drug Branch P.O. Box 997 413 Sacramento, California 95899-74413

Re: K052090

Trade/Device Name: Splash! Impression Material Device

Regulation Number: 21 CFR 872.3660 Regulation Name: Impression Material

Regulatory Class: II Product Code: ELW Dated: July 26, 2005 Received: August 2, 2005

Dear Dr. Quattrone:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050. This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital Infection Control and Dental Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

V. <u>Indications for Use Statement</u>

510(k) Number: K652090

Intended Use	<u>e</u>				
occlus	ntal Impression M sal and dental imp it's teeth and gum	plant impression	ded for use with al n techniques to rep	I crowns, bridges, produce the structu	, ure o
(PLEASE DO	NOT WRITE BELO)W THIS I INF = 0	CONTINUE ON ANG	THER PAGE IF NE	ign g
(PLEASE DO			CONTINUE ON ANC		EDE.
Prescription Use	Concurrence		of Device Evaluation (EEDE.
	Concurrence X ion 801.109)	of CDRH, Office	of Device Evaluation ((ODE)	EEDE.